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March 12, 2020

By ECF

Hon. Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: United States v. Robert Wade
19 Cr. 875 (LTS)

Dear Judge Swain:

As the Court is aware, I represent Robert Wade, the defendant in the above referenced matter. Mr. Wade currently has a bail hearing scheduled for March 13, 2020, at 10:00 a.m. I am writing with the consent of the Government to respectfully request an adjournment of this proceeding. Due to the recent issues at the Metropolitan Correctional Center (MCC) where Mr. Wade is being detained (which included suspension of legal visits and no opportunity for the inmates to contact counsel or family), I was not able to meet with Mr. Wade from the date of our last conference on February 27, 2020, until yesterday, March 11, 2020. Accordingly, I need more time to put together a proposed bail package. After conferring with the Government, the following dates work for the parties: March 23, 24, or 27, 2020 (preferably in the morning so that family members can be present). This represents my first request of this kind.

The Court's time and attention to this request are very much appreciated.

Respectfully submitted,

-s-

Anthony Strazza, Esq.

cc. All parties (via ECF)
Lisa Chan, U.S. Pretrial Services Officer